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February 24, 2019

Via Electronic Submission

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: EB Docket No. 06-36; CPNI Certification due March 1, 2019

Dear Ms. Dortch:

Callifi LLC, pursuant to Section 64.2009(e) of the Commission's rules, hereby submits its annual CPNI compliance certification and accompanying statement.

Should you have questions regarding this submission, please contact the undersigned.

Respectfully submitted,

/s/ Cheng-yi Liu

Counsel for Callifi LLC

Enclosures

ANNUAL 64.2009(E) CPNI CERTIFICATION
EB DOCKET 06-36

Certification for: 2019 **Covers prior calendar year:** 2018

Company covered by this certification: Callifi LLC

Filer 499 ID: 830814

Name of signatory: Gilad Abada

Title of signatory: CTO

CERTIFICATION

1. I certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: 

Date: 2/20/19

Attachment: Accompanying Statement explaining CPNI procedures

Callifi LLC
Customer Proprietary Network Information
Policy Statement

A. Basis and Purpose

(1) Callifi LLC (the “Company”) has adopted these customer proprietary network information (“CPNI”) policies and procedures (the “Policy Statement”) to ensure compliance with Section 222 of the Communications Act of 1934, as amended, 47 U.S.C. § 222, and the Federal Communications Commission’s (“Commission’s”) CPNI regulations contained in 47 C.F.R. §§ 64.2001 *et seq.*

(2) The Company does not intend to use, disclose, or permit access to CPNI for marketing purposes but, if it should do so, will comply with the applicable policies herein.

(3) The Company does not use, disclose, or permit access to CPNI for any purpose which would require opt-in or opt-out consent of a customer under 47 C.F.R. § 64.2001 *et seq.*

B. Definitions

This Policy Statement adopts the following definitions, including those set forth in 47 C.F.R. § 64.2003 of the Commission’s rules. To the extent that the definitions in 47 C.F.R. § 64.2003 are modified, this Policy Statement should be interpreted in accordance with the modified definitions.

Account information. “Account information” is information that is specifically connected to the customer's service relationship with the carrier, including such things as an account number or any component thereof, the telephone number associated with the account, or the bill's amount.

Address of record. An “address of record,” whether postal or electronic, is an address that the carrier has associated with the customer's account for at least 30 days.

Affiliate. The term “affiliate” means a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this definition, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 percent.

Call detail information. Any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, or duration of any call.

Communications-related services. The term “communications-related services” means telecommunications services, information services typically provided by

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telecommunications carriers, and services related to the provision or maintenance of customer premises equipment.

Customer. A customer of a telecommunications carrier is a person or entity to which the telecommunications carrier is currently providing service.

Customer proprietary network information (CPNI). The term “customer proprietary network information (CPNI)” means (a) information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (b) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier; except that such term does not include subscriber list information..

Customer premises equipment (CPE). The term “customer premises equipment (CPE)” means equipment employed on the premises of a person (other than a carrier) to originate, route, or terminate telecommunications.

Interconnected VoIP services. The term “interconnected VoIP services” means (as set forth in 47 C.F.R. § 9.3 of the Commission’s rules) a service that: (1) enables real-time, two-way voice communications; (2) requires a broadband connection from the user’s location; (3) requires Internet protocol-compatible customer premises equipment (CPE); and (4) permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network.

Information services typically provided by telecommunications carriers. The phrase “information services typically provided by telecommunications carriers” means only those information services that are typically provided by telecommunications carriers, such as Internet access or voice mail services. Such phrase “information services typically provided by telecommunications carriers,” as used in this Policy Statement, shall not include retail consumer services provided using Internet websites (such as travel reservation services or mortgage lending services), whether or not such services may otherwise be considered to be information services.

Local exchange carrier (LEC). The term “local exchange carrier (LEC)” means any person that is engaged in the provision of telephone exchange service or exchange access. Such term does not include a person insofar as such person is engaged in the provision of a commercial mobile service, except to the extent that the Commission finds that such service should be included in the definition of such term.

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Opt-in approval. The term “opt-in approval” refers to a method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. This approval method requires that the carrier obtain from the customer affirmative, express consent allowing the requested CPNI usage, disclosure, or access after the customer is provided appropriate notification of the carrier's request consistent with the requirements set forth in this subpart.

Opt-out approval. The term “opt-out approval” refers to a method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. Under this approval method, a customer is deemed to have consented to the use, disclosure, or access to the customer's CPNI if the customer has failed to object thereto within a minimum 30-day waiting period after the customer is provided appropriate notification of the carrier's request for consent.

Readily available biographical information. “Readily available biographical information” is information drawn from the customer's life history and includes such things as the customer's social security number, or the last four digits of that number; mother's maiden name; home address; or date of birth.

Subscriber list information (SLI). The term “subscriber list information (SLI)” means any information: (a) identifying the listed names of subscribers of a carrier and such subscribers' telephone numbers, addresses, or primary advertising classifications (as such classifications are assigned at the time of the establishment of such service), or any combination of such listed names, numbers, addresses, or classifications; and (b) that the carrier or an affiliate has published, caused to be published, or accepted for publication in any directory format.

Telecommunications carrier or carrier. The terms “telecommunications carrier” or “carrier” means any provider of telecommunications services, except that such term does not include aggregators of telecommunications services and, for the purposes of this Policy Statement shall include an entity that provides interconnected VoIP service, as that term is defined in Section 9.3 of the Commission's rules (47 C.F.R. § 9.3).

Telecommunications service. The term “telecommunications service” means the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used.

Telephone number of record. The telephone number associated with the underlying service, not the telephone number supplied as a customer's “contact information.”

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Valid photo ID. A “valid photo ID” is a government-issued means of personal identification with a photograph such as a driver's license, passport, or comparable ID that is not expired.

C. Company Policies for the Use of CPNI

(1) The Company's policy is that it may, if applicable, use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service (*i.e.*, local, interexchange, and commercial mobile radio service) to which the customer already subscribes from the Company, without customer approval.

(2) If the Company provides different categories of service, and a customer subscribes to more than one category of service offered by the Company, the Company is permitted to share CPNI among the Company's affiliated entities that also provide a service offering to the same customer. However, if the Company provides different categories of service, but a customer does not subscribe to more than one offering by the Company, the Company is not permitted to share CPNI with its affiliates, except with the customer's opt-in or opt-out approval.

(3) The Company may not use, disclose, or permit access to CPNI to market to a customer service offerings that are within a category of service to which the customer does not already subscribe from the Company, unless the Company has customer approval to do so, except as described in paragraphs (5) and (6) of this section.

(4) The Company may not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.

(5) It is the Company's policy that it may, if applicable, use, disclose, or permit access to CPNI, without customer approval for the provision of inside wiring installation, maintenance, and repair services.

(6) As a provider of interconnected VoIP service (or if the Company should provide LEC service or CMRS), the Company may use CPNI, without customer approval, to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

(7) Notwithstanding the foregoing, it is the Company's policy that it may use, disclose, or permit access to CPNI to protect the rights or property of the Company, or to protect users of the Company's services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

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D. Customer Notices and Approvals for Use of CPNI

(1) The Company recognizes that in many situations it may not use, disclose, or permit access to CPNI, without customer approval. The Company also recognizes that prior to any solicitation for customer approval, the Company must provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI, and the Company must maintain records of notification, whether oral, written or electronic, for at least one year. Finally, the Company recognizes that, when applicable, it would, among other things, be required to: (a) implement a system by which the status of a customer's CPNI approval can be clearly established; (b) maintain records of sales/marketing campaigns which use CPNI; and (c) establish a supervisory review process for outbound marketing situations.

(2) Notwithstanding the foregoing, the Company does not intend to use, disclose, or permit access to CPNI for any purpose which would require customer notices and approvals. If the Company should ever plan to use, disclose or permit access to CPNI for any such purposes, the Company will also revise this Policy Statement to incorporate policies and procedures in accordance with the Commission's applicable regulations contained in 47 C.F.R. §§ 64.2001 *et seq.* (specifically, 47 C.F.R. §§ 64.2007 – 2009, as well as any other then-applicable Commission regulations).

E. Safeguards Required for the Use of CPNI

(1) It is the Company's policy to train its personnel as to when they are and are not authorized to use, disclose or permit access to CPNI. The Company has established an express disciplinary process to ensure compliance with its CPNI policies contained in this Policy Statement. Company personnel who violate the policies herein are subject to disciplinary actions which can include termination.

(2) In compliance with 47 C.F.R. § 64.2009(e), the Company will have an officer, as an agent of the Company, sign and file with the Commission a compliance certificate on an annual basis. The officer will state in the certification that he or she has personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, 47 C.F.R. § 64.2001 *et seq.* The certification will be accompanied by this Policy Statement. The certification will also include an explanation of any actions taken by the Company against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing will be made annually on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year.

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F. Safeguards on the Disclosure of CPNI

(1) It is the Company's policy to take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI.

(2) In addition to implementing appropriate data security measures to secure its CPNI, the Company will properly authenticate a customer prior to disclosing CPNI based on customer-initiated telephone contact, online account access, or in-store visits.

(3) *Telephone access to CPNI.* The Company's policy is that it may only disclose call detail information over the telephone, based on customer-initiated telephone contact, if the customer first provides the Company with a password, as described in paragraph (6) of this section, that is not prompted by the Company asking for readily available biographical information, or account information. If the customer does not provide a password, the Company may only disclose call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record. If the customer is able to provide call detail information to the Company during a customer-initiated call without the Company's assistance, then the Company is permitted to discuss the call detail information provided by the customer.

(4) *Online access to CPNI.* The Company will authenticate a customer without the use of readily available biographical information, or account information, prior to allowing the customer online access to CPNI related to a telecommunications service account. Once authenticated, the customer may only obtain online access to CPNI related to a telecommunications service account through a password, as described in paragraph (e) of this section, that is not prompted by the Company asking for readily available biographical information, or account information.

(5) *In-store access to CPNI.* If it has retail locations, the Company's policy is that it may disclose CPNI to a customer who, at a retail location, first presents to the Company or its agent a valid photo ID matching the customer's account information.

(6) *Password Procedures.* The Company will allow customers to establish a password and back-up customer authentication methods (for example, additional security questions or personal identification numbers) at account signup without the need for further authentication. Otherwise, to establish a password, the Company must authenticate the customer without the use of readily available biographical information, or account information. The Company may utilize a back-up customer authentication method in the event of a lost or forgotten password, but such back-up customer authentication method may not prompt the customer for readily available biographical information, or account information. If a customer cannot provide the correct

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password or the correct response for the back-up customer authentication method, the customer must establish a new password as described in this paragraph.

(7) *Notification of account changes.* The Company will notify customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed. This notification is not required when the customer initiates service, including the selection of a password at service initiation. This notification may be through a Company-originated voicemail or text message to the telephone number of record, by mail (either physical or electronic) to the address of record, and must not reveal the changed information or be sent to the new account information.

(8) *Business customer exemption.* The Company may bind itself contractually to authentication regimes other than those described in this section for services it provides business customers that have both a dedicated account representative and a contract that specifically addresses the Company's protection of CPNI.

E. Notification of CPNI Security Breaches

(1) The Company will notify law enforcement of a breach of its customers' CPNI as provided in this section. As used in this section, a "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI. The Company shall not notify its customers or disclose the breach publicly, whether voluntarily or under federal, state or local law, until it has completed the process of notifying law enforcement pursuant this section.

(2) As soon as practicable, and in no event later than seven (7) business days, after reasonable determination of the breach, the Company shall electronically notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) through a central reporting facility linked on the Commission website (<http://www.fcc.gov/eb/cpni>).

(a) Notwithstanding any state law to the contrary, the Company shall not notify customers or disclose the breach to the public until seven (7) full business days have passed after notification to the USSS and the FBI except as provided in paragraphs (2)(b) and (2)(c) of this section.

(b) If the Company believes that there is an extraordinarily urgent need to notify any class of affected customers sooner than otherwise allowed under paragraph (2)(a) of this section, in order to avoid immediate and irreparable harm, it shall so indicate in its notification and may proceed to immediately notify its affected customers only after consultation with the relevant investigating agency. The Company shall cooperate with

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the relevant investigating agency's request to minimize any adverse effects of such customer notification.

(c) If the relevant investigating agency determines that public disclosure or notice to customers would impede or compromise an ongoing or potential criminal investigation or national security, the Company shall comply with such agency's directive not to so disclose or notify for an initial period of up to 30 days, and such extended periods as reasonably necessary in the judgment of the agency.

(3) After the Company has completed the process of notifying law enforcement pursuant to this section, it shall notify its customers of a breach of those customers' CPNI.

(4) *Recordkeeping.* The Company will maintain a record, electronically or in some other manner, of any breaches discovered, notifications made to the USSS and the FBI pursuant to this section, and notifications made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. The Company will retain the record for a minimum of 2 years.